

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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MACKENZIE ARCHITECTS, P.C.,

Plaintiff,

-against-

VLG REAL ESTATE DEVELOPERS, LLC, VICTOR  
GUSH, FGR ASSOCIATES, LLC, CAPTAINS LOOKOUT  
DEVELOPMENT, LLC, DESIGN LOGIC ARCHITECTS, PC,  
CLARK REALTY, LLC, PAUL CLARK, FRANK TATE  
And ROBERT BUCHER,

Civil Action No. 1:15-CV-1105  
(TJM/RFT)

**NOTICE OF  
MOTION FOR JUDGMENT  
ON THE PLEADINGS**

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying affidavit of Jason L. Shaw, Esq. and the accompanying affidavit of Robert Bucher, together with accompanying exhibits, defendants Design Logic Architects PC and Robert Bucher will move this Court at 10 a.m. on April 11, 2016 at the U.S. District Courthouse, 445 Broadway, Albany, New York pursuant to Fed. R. Civ. Proc. 12(c) for a judgment on the pleadings dismissing the second, fifth, eighth, thirteenth, and fourteenth causes of action of the First Amended Complaint as to Design Logic Architects PC and Robert Bucher and for an award of attorney's fees to Design Logic Architects PC and Robert Bucher pursuant to 17 U.S.C. § 505 upon the ground that the allegations in the Amended Complaint of copyright violations are objectively unreasonable and frivolous.

Dated: February 29, 2016

By: /s/ Jason L. Shaw, Esq.  
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